

WILENTZ, GOLDMAN & SPITZER

A Professional Corporation

90 Woodbridge Center Drive

Post Office Box 10

Woodbridge, New Jersey 07095

(732) 636-8000

and

LAW OFFICES OF WEICHENG WANG

197 Route 18, Suite 309

East Brunswick, New Jersey 08816

(732) 418-8865

Attorneys for Defendants

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

-----X
IN RE PEAKTOP TECHNOLOGIES (USA), :
INC. SHAREHOLDER DERIVATIVE :
LITIGATION, :
:

Plaintiffs,

Civil Action No. 06 CV 8228

v. :

**NOTICE OF MOTION FOR
PRO HAC VICE ADMISSION OF
EDWARD T. KOLE AND
JAMES E. TONREY, JR.**

PEAKTOP INTERNATIONAL HOLDINGS :
LIMITED, et al., :

Defendants. :

-----X

TO: Sean F. Kane, Esq.
Drakeford & Kane LLC
475 Park Avenue South, 15th Floor
New York, New York 10016

SIR:

PLEASE TAKE NOTICE that, on a date and at a time to be set by the Court, the undersigned attorneys for defendants Peaktap Investment Holdings (B.V.I.) Limited ("Peaktap Holdings"), SRG Group, Chun Kuei Lin, Vincent Wei Hung Lin, Mike Wu, and Chun-Hui Huang ("defendants") shall apply to the United States District Court, Southern District of New

York, 500 Pearl Street, New York, New York before the Honorable Jed S. Rakoff for an Order admitting Edward T. Kole and James E. Tonrey, Jr., pro hac vice with respect to the above matter.

PLEASE TAKE FURTHER NOTICE that, in support of this motion, defendants will rely upon the accompanying declarations of Edward T. Kole, James E. Tonrey, Jr. and Willard C. Shih, which are being filed and served herewith.

PLEASE TAKE FURTHER NOTICE that a proposed form of order is being submitted herewith.

DATED: December 12, 2006

WILENTZ, GOLDMAN & SPITZER
A Professional Corporation

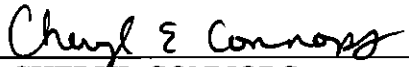
BY: s/Willard C. Shih
WILLARD C. SHIH
Attorneys for Defendants

CERTIFICATION

I hereby certify that on the 12th day of December, 2006, I served copies of the within Notice of Motion; the supporting Declarations of Edward T. Kole, James E. Tonrey, Jr. and Willard C. Shih; and the proposed form of Order, via Overnight Mail, to counsel for the Plaintiff as follows:

Sean F. Kane, Esq.
Drakeford & Kane LLC
475 Park Avenue South, 15th Floor
New York, New York 10016

Dated: December 12, 2006


CHERYL CONNORS

WILENTZ, GOLDMAN & SPITZER
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**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

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IN RE PEAKTOP TECHNOLOGIES	:
(USA), INC. SHAREHOLDER	:
DERIVATIVE LITIGATION,	:
	: Civil Action No. 06 CV 8228 (JSR)
Plaintiffs,	:
	:
v.	:
	:
PEAKTOP INTERNATIONAL	:
HOLDINGS LIMITED, et al.,	:
	:
Defendants.	:
-----X	

**DECLARATION OF
EDWARD T. KOLE**

EDWARD T. KOLE, of full age, being duly sworn, according to law, upon his oath
deposes and says:

1. I am an attorney at law admitted to practice before the Courts of the State of New Jersey and a shareholder of the law firm of Wilentz, Goldman & Spitzer, P.A., attorneys for defendants in the above-captioned matter. I am submitting this declaration in support of my application for admission pro hac vice with respect to the above matter.

2. I was admitted to practice as an attorney in the State of New Jersey and the United States District Court for the District of New Jersey in 1987. I was also admitted to practice in the United States Supreme Court in 2003 and the U.S. Court of Appeals, Third Circuit in 1998. I am a member in good standing in these jurisdictions and have not been the subject of any disciplinary action or proceedings. I am attaching hereto as Exhibit A my certificate of good standing from the Supreme Court of New Jersey, dated December 11, 2006.

3. I have been asked by defendants to represent them in this matter. I have extensive knowledge of matters relevant to this action, which will facilitate Defendants' representation in this case.

4. I understand that I will be bound by all of the Rules governing the United States District Court, Southern District of New York, including its Disciplinary Rules.

5. On the basis of the foregoing, I respectfully request that I be admitted to this Court pro hac vice for the purpose of representing defendants in this matter.

6. Counsel of record for Defendant is Wilentz, Goldman & Spitzer, P.C. Wilentz, Goldman & Spitzer maintains an office at 90 Woodbridge Center Drive, Woodbridge, New Jersey 07095, where all notices, orders and pleadings may be served.

7. I shall have all pleadings, briefs and other documents filed with the Court signed by a representative of the firm of Wilentz, Goldman & Spitzer, P.C., which has agreed to be responsible for the conduct of this matter and for my participation in the proceedings herein.

I hereby declare under penalty of perjury that the foregoing is true and correct.

DATED: December 12, 2005


EDWARD T. KOLE

Exhibit A

Supreme Court of New Jersey



Certificate of Good Standing

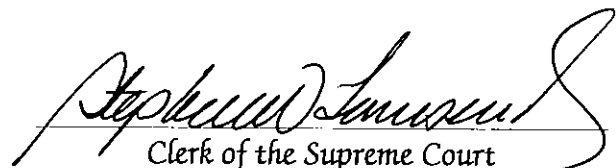
This is to certify that **EDWARD T KOLE**
(No. **018521987**) was constituted and appointed an Attorney at Law of New
Jersey on **December 18, 1987** and, as such,
has been admitted to practice before the Supreme Court and all other courts of this State
as an Attorney at Law, according to its laws, rules, and customs.

I further certify that as of this date, the above-named is an Attorney at Law in
Good Standing. For the purpose of this Certificate, an attorney is in "Good Standing"
if the Court's records reflect that the attorney: 1) is current with all assessments
imposed as a part of the filing of the annual Attorney Registration Statement, including,
but not limited to, all obligations to the New Jersey Lawyers' Fund for Client
Protection; 2) is not suspended or disbarred from the practice of law; 3) has not
resigned from the Bar of this State; and 4) has not been transferred to Disability
Inactive status pursuant to Rule 1:20-12.

*Please note that this Certificate does not constitute confirmation of an attorney's
satisfaction of the administrative requirements of Rule 1:21-1(a) for eligibility to
practice law in this State.*



In testimony whereof, I have
hereunto set my hand and
affixed the Seal of the
Supreme Court, at Trenton, this
11TH day of December , 20 06


Clerk of the Supreme Court

WILENTZ, GOLDMAN & SPITZER

A Professional Corporation

90 Woodbridge Center Drive

Post Office Box 10

Woodbridge, New Jersey 07095

(732) 636-8000

and

LAW OFFICES OF WEICHENG WANG

197 Route 18, Suite 309

East Brunswick, New Jersey 08816

(732) 418-8865

Attorneys for Defendants

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

-----X

IN RE PEAKTOP TECHNOLOGIES :

(USA), INC. SHAREHOLDER :

DERIVATIVE LITIGATION, :

Civil Action No. 06 CV 8228 (JSR)

Plaintiffs, :

DECLARATION OF

JAMES E. TONREY, JR.

v. :

PEAKTOP INTERNATIONAL :

HOLDINGS LIMITED, et al., :

Defendants. :

-----X

JAMES E. TONREY, JR., of full age, being duly sworn, according to law, upon his oath deposes and says:

1. I am an attorney at law admitted to practice before the courts of the State of New Jersey and the State of New York and I am counsel in the law firm of Wilentz, Goldman & Spitzer, P.A., located in Woodbridge, New Jersey, attorneys for defendants in the above-referenced matter. I am submitting this declaration in support of my application for pro hac vice admission to represent defendants in the above matter.

2. I was admitted to practice as an attorney in the State of New York in 1995 and the State of New Jersey in 1994. I was also admitted to practice in the United States Supreme Court in 2003 and the United States District Court for the District of New Jersey in 1994. I am a member in good standing in these jurisdictions and have not been the subject of any disciplinary action or proceedings. I am attaching hereto as Exhibit A a copy of my certificates of good standing from the Supreme Court of New Jersey, dated December 11, 2006, and the Appellate Division of the Supreme Court of the State of New York (Second Judicial Department), dated October 18, 2006 (a more recent certificate of good standing has been ordered from the Appellate Division and will be provided to the Court as a supplemental submission upon receipt thereof).

3. I have extensive knowledge of matters relevant to this action, which will facilitate defendants' representation in this case.

4. I understand that I will be bound by all of the Rules governing the United States District Court, Southern District of New York, including its Disciplinary Rules.

5. On the basis of the foregoing, I respectfully request that I be admitted to this Court pro hac vice for the purpose of representing defendants.

6. Counsel of record for Defendant is Wilentz, Goldman & Spitzer, P.C. Wilentz, Goldman & Spitzer maintains an office at 90 Woodbridge Center Drive, Woodbridge, New Jersey 07095, where all notices, orders and pleadings may be served.

7. I shall have all pleadings, briefs and other documents filed with the Court signed by a representative of the firm of Wilentz, Goldman & Spitzer, P.C., which has agreed to be responsible for the conduct of this matter and for my participation in the proceedings herein.

I hereby declare under penalty of perjury that the foregoing is true and correct.

DATED: December 12, 2006


JAMES E. TONREY, JR.

Exhibit A

Supreme Court of New Jersey

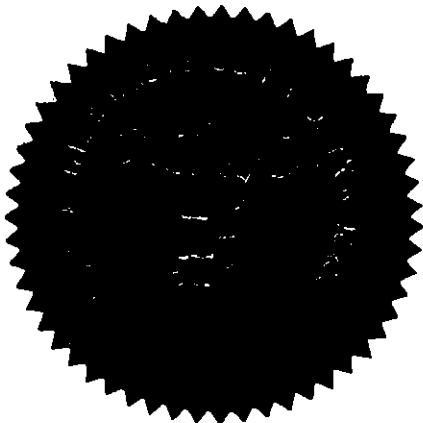


Certificate of Good Standing

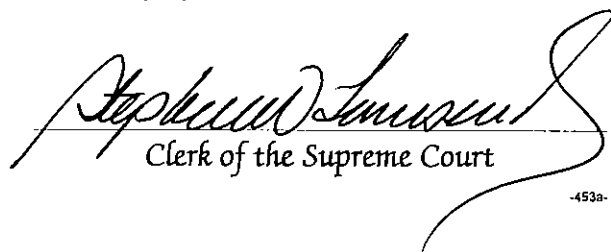
This is to certify that **JAMES E TONREY JR**
(No. **039821994**) was constituted and appointed an Attorney at Law of New
Jersey on **December 23, 1994** and, as such,
has been admitted to practice before the Supreme Court and all other courts of this State
as an Attorney at Law, according to its laws, rules, and customs.

I further certify that as of this date, the above-named is an Attorney at Law in
Good Standing. For the purpose of this Certificate, an attorney is in "Good Standing"
if the Court's records reflect that the attorney: 1) is current with all assessments
imposed as a part of the filing of the annual Attorney Registration Statement, including,
but not limited to, all obligations to the New Jersey Lawyers' Fund for Client
Protection; 2) is not suspended or disbarred from the practice of law; 3) has not
resigned from the Bar of this State; and 4) has not been transferred to Disability
Inactive status pursuant to Rule 1:20-12.

*Please note that this Certificate does not constitute confirmation of an attorney's
satisfaction of the administrative requirements of Rule 1:21-1(a) for eligibility to
practice law in this State.*



In testimony whereof, I have
hereunto set my hand and
affixed the Seal of the
Supreme Court, at Trenton, this
11TH day of December , 20 06

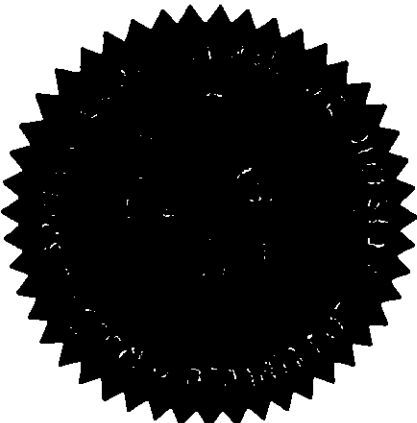

Clerk of the Supreme Court



**Appellate Division of the Supreme Court
of the State of New York
Second Judicial Department**

I, **James Edward Pelzer**, Clerk of the Appellate Division of the Supreme Court of the State of New York, Second Judicial Department, do hereby certify That **James Edward Tonrey, Jr.** was duly licensed and admitted to practice as an Attorney and Counselor at Law in all the courts of the State, according to the laws of the State and the court rules and orders, on the **8th** day of **February 1995** has duly taken and subscribed the oath of office prescribed by law, has been enrolled in the Roll of Attorneys and Counselors at Law on file in my office, has duly registered with the administrative office of the courts, and according to the records of this court is in good standing as an attorney and counselor at law.

In Witness Whereof, I have hereunto set my hand and affixed
the seal of said Appellate Division on **October 18, 2006**



James Edward Pelzer

Clerk

WILENTZ, GOLDMAN & SPITZER
A Professional Corporation
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and

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Attorneys for Defendants

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

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(USA), INC. SHAREHOLDER	:
DERIVATIVE LITIGATION,	:
	: Civil Action No. 06 CV 8228 (JSR)
Plaintiffs,	:
	:
v.	:
	:
PEAKTOP INTERNATIONAL	:
HOLDINGS LIMITED, et al.,	:
	:
Defendants.	:
-----X	

**DECLARATION OF
WILLARD C. SHIH**

WILLARD C. SHIH, of full age, being duly sworn, according to law, upon his oath deposes and says:

1. I am an attorney admitted to practice in the United States District Court, Southern District of New York and am a shareholder with the law firm of Wilentz Goldman & Spitzer, P.C., attorneys for defendants in the above-captioned matter.

2. I submit this affidavit in support of defendants' motion for the pro hac vice admission of Edward T. Kole and James E. Tonrey for the purposes of representing defendants before this Court.

3. Mr. Kole is a shareholder and Mr. Tonrey is counsel with the firm of Wilentz Goldman & Spitzer, P.A., with an office address of 90 Woodbridge Center Drive, Woodbridge, New Jersey 07095.

4. As is more fully set forth in Mr. Kole's Certification, Mr. Kole is a member in good standing of the bar of the State of New Jersey, having been admitted to practice in 1987. He is also admitted to practice as an attorney in the United States Supreme Court (2003); the United States Court of Appeals, Third Circuit (1998); and the United States District Court, District of New Jersey (1987).

5. As is more fully set forth in Mr. Tonrey's Declaration, he is a member in good standing of the bars of the States of New Jersey and New York, having been admitted in 1994 and 1995, respectively. He is also admitted to practice as an attorney in the United States Supreme Court (2003) and the United States District Court, District of New Jersey (1994).

5. There is good cause for the admission of Messrs. Kole and Tonrey. They are currently representing Peaktap Investment Holdings (B.V.I.) Limited in litigation pending in the United States District Court for the District of New Jersey. Defendants have requested that Mr. Kole represent them in the above-captioned matter, and Messrs. Kole and Tonrey have extensive knowledge of matters relevant to this action, which will facilitate Defendant's representation in this case.

6. I have been advised that Messrs. Kole and Tonrey have reviewed provisions of the Rules governing the United States District Court, Southern District of New York, including its Disciplinary Rules.

7. On behalf of defendants, we therefore respectfully request that this Court admit Messrs. Kole and Tonrey for the purposes of representing defendants in this action.

I hereby declare under penalty of perjury that the foregoing is true and correct.

DATED: December 12, 2006

s/Willard C. Shih
WILLARD C. SHIH

WILENTZ, GOLDMAN & SPITZER
A Professional Corporation
90 Woodbridge Center Drive
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and

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Attorneys for Defendants

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

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	: Civil Action No. 06 CV 8228 (JSR)
Plaintiffs,	:
	:
v.	:
	:
PEAKTOP INTERNATIONAL	:
HOLDINGS LIMITED, et al.,	:
	:
Defendants.	:
-----X	

**ORDER ADMITTING
EDWARD T. KOLE AND
JAMES E. TONREY, JR.
PRO HAC VICE**

THIS MATTER having come before the Court on on the application of Wilentz Goldman & Spitzer, P.C., attorneys for Defendant Peaktap Investment Holdings (B.V.I.) Limited for the admission of Edward T. Kole and James E. Tonrey, Jr., pro hac vice; upon notice to Sean F. Kane, Esq. of Drakeford & Kane LLC, attorneys for plaintiff GeoGlobal Partners LLC; and there being no objection to the application, and for good cause shown,

IT IS on this _____ day of December, 2006

ORDERED that:

1. Edward T. Kole and James E. Tonrey, Jr. be and are hereby admitted pro hac vice for the purpose of appearing, participating and representing Defendant Peaktop Investment Holdings (B.V.I.) Limited, in the above-captioned matter, subject to the following terms and conditions:
2. They shall abide by the United States District Court rules, including the Local Rules for the for the Southern and Eastern Districts of New York;
3. They shall consent to the appointment of the Clerk of the Southern District of New York as an agent upon whom service of process may be made for all actions against their firm that may arise out of their participation in this matter;
4. They shall each notify the Court immediately of any matter affecting their standing at the Bar of any other Court;
5. They shall have all pleadings, motions and other papers filed or served in the case, signed by local counsel, who shall be held responsible for them and for the conduct of the within cause;
6. Noncompliance with any of these requirements may be grounds of disqualification of the pro hac vice counsel;
7. A copy of this Order shall be served by counsel for Defendant within seven (7) days of receipt of same.

HON. JED S. RAKOFF